

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

RICARDO SANTIAGO, VAUGHN  
FREDERICK on their own behalf, and on  
behalf of those similarly situated,

Plaintiffs,

v.

TOTAL LIFE CHANGES, LLC and “JOHN  
DOES 1-5”, fictitious name used to identify  
presently unknown entities.,

Defendants.

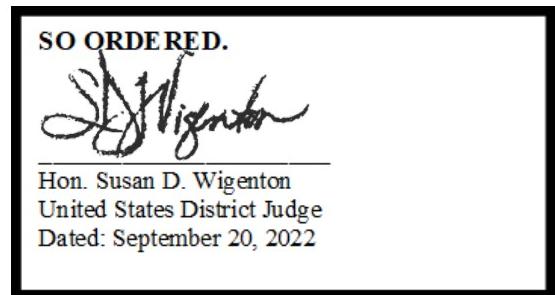
Civil Action No: 20-18581  
(SDW)(LDW)

**Hon. Susan D. Wigenton**

**Hon. Leda D. Wettre, Magistrate  
Judge**

**STIPULATION OF DISMISSAL PURSUANT TO  
FED. R. CIV. P. 41(a)(1)(A)(ii)**

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiffs Ricardo Santiago<sup>1</sup> (“Santiago”) and Vaughn Frederick (“Frederick”), and Defendant Total Life Changes, LLC, by and through their undersigned counsel, hereby stipulate and agree to the dismissal of this action without prejudice, with each party to bear its own fees and costs.



<sup>1</sup> Plaintiff Santiago’s claims have already been dismissed with prejudice. (ECF Nos. 47, 48.)

Dated: September 19, 2022

s/ Jarred S. Freeman

Jarred S. Freeman, Esq.

**LAW OFFICE OF JARRED S.  
FREEMAN L.L.C.**

Jarred S. Freeman, Esq.

3480 Park Ave., Suite 202 A

Edison, NJ 08820

Tel: (732) 494-7900

Fax: (732) 494-7904

jarred.freemanlaw@gmail.com

**COBURN & GREENBAUM, PLLC**

Jonathan Greenbaum, Esq.

Panida Pollawit, Esq.

1710 Rhode Island Avenue, NW

Washington, DC 20036

Tel: (202) 470-1689

Fax: (866) 561-9712

jg@coburngreenbaum.com

panida@coburngreenbaum.com

**RICHMAN LAW FIRM PLLC**

Scott B. Richman, Esq.

630 Third Avenue, 23rd Floor

New York, New York 10017

Tel: (646) 854-3547

Fax: (646) 693-6578

srichman@richman-law-firm.com

*Attorneys for Plaintiffs*

s/ Lauri A. Mazzuchetti

Lauri A. Mazzuchetti

**KELLEY DRYE & WARREN LLP**

Lauri A. Mazzuchetti

Glenn T. Graham

One Jefferson Road, 2nd Floor

Parsippany, NJ 07054

Tel: (973) 503-5900

lmazzuchetti@kelleydrye.com

ggraham@kelleydrye.com

*Attorneys for Defendant Total Life  
Changes, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 19, 2022, a true and correct copy of the foregoing STIPULATION OF VOLUNTARY DISMISSAL PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(ii) was filed electronically with the Clerk of the above-captioned Court utilizing the Court's CM/ECF system, resulting in an automatic transmission of a Notice of Electronic Filing to all counsel of record in the above-referenced proceeding.

By: s/ Jarred S. Freeman  
Jarred S. Freeman, Esq.